

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS,

Plaintiff,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

STATE OF ILLINOIS; JB PRITZKER, in
his official capacity as Governor of the
State of Illinois; JAMES BENNETT, in his
official capacity as Director of the Illinois
Department of Human Rights; KWAME
RAOUL, in his official capacity as Attor-
ney General of the State of Illinois; and
ALEXI GIANNOULIAS, in his official ca-
pacity as Secretary of State of the State of
Illinois,

Defendants.

Case No. 1:25-cv-00669

Judge Coleman

DECLARATION OF EDWARD BLUM

1. I am over the age of 18, of sound mind, and otherwise competent to sign this declaration.
2. I am President of the American Alliance for Equal Rights.
3. The American Alliance for Equal Rights is a nationwide membership organization founded in 2021 that is dedicated to challenging distinctions and preferences based on race and ethnicity. It has more than 250 members and continues to grow. Members voluntarily join. They pay dues. They support the Alliance's mission. And the Alliance represents them in good faith.

4. In 2024, Illinois enacted 805 ILCS §105/114.15. The law was passed to “encourage nonprofits to reflect the diversity of the communities they support.” *Gov. Pritzker Signs LGBTQ+ Affirming Bills*, Gov. JB Pritzker (June 30, 2024), perma.cc/6SFJ-XVVZ. The law accomplishes that goal by forcing qualifying nonprofits to gather and publicize “the aggregated demographic information of the[ir] directors and officers, including race, ethnicity, gender, disability status, veteran status, sexual orientation, and gender identity.” 805 ILCS §105/114.15(a). Qualifying nonprofits must keep that “demographic information” on their websites “for at least 3 years after it is posted.” *Id.*

5. The Alliance has members who will be harmed by 805 ILCS §105/114.15. That includes Members A and B. Members A-B are dues-paying members of the Alliance, as are their leaders, Officers A and B.

6. The Alliance knows Officers A and B and their organizations. It has reviewed their tax filings and websites. The statements about Members A-B in the verified complaint and in the declarations are consistent with these materials and the Alliance’s preexisting knowledge.

7. 805 ILCS §105/114.15 directly regulates Members A and B. Members A and B are “charitable organizations” that are incorporated for philanthropic and civic purposes. 805 ILCS §105/103.5(a). Because Members A and B are 501(c)(3) corporations, they are charitable organizations under Illinois law. §105/103.05(a)(31). Members A and B annually contribute more than \$1,000,000 in grants to other charitable organizations. And Members A and B file an AG990-IL Charitable Organization Annual Report with the Illinois Attorney General in November of each year.

8. Based on my decades of experience in the nonprofit sector and interacting with donors, I believe that §105/114.15 pressures qualifying nonprofits to discriminate by considering, or giving preferences to minorities based on, the statute’s demographic criteria when selecting officers and directors.

9. Many private organizations that police nonprofits judge them based on the demographic composition of their boards. *E.g.*, Candid, *Mission* (archived Mar. 20, 2025), perma.cc/5JDK-8JNE; Center for Effective Philanthropy, *Staff Perception Report* (archived Mar. 20, 2025), perma.cc/5T7W-Z3D9. One of those organizations is Candid, which is “the largest source of information about philanthropy” in the world. *Mission, supra*. Section 105/114.15 would allow Candid and others to take nonprofits’ demographic data, assess it, and then publish a report that claims those organizations are insufficiently diverse, are not inclusive, and discriminate against minorities—false charges that would reduce a nonprofit’s donations, reputation, and standing in the relevant communities. To take one well-known example, the Southern Poverty Law Center’s designation of nonprofits as “hate groups” has led prominent programs to exclude those nonprofits from donations. *E.g.*, Ltr. From Chairman Comer to Secretary Cardona re: SPLC (Dec. 11, 2023), perma.cc/8UMP-4RTP.

10. Section 105/114.15 will also empower the public to pressure nonprofits to discriminate by considering or giving preferences to minorities based on the statute’s demographic criteria. I have experienced similar consequences firsthand. I have been a vocal advocate against racial and ethnic preferences for decades. And during that time—as I explain below—I have faced a torrent of death threats, doxing, and harassment for merely promoting colorblindness. Nonprofits that practice colorblindness or deviate from proportional representation face public shaming and harassment from many vocal and influential organizations, activist groups, and politicians.

11. Moreover, once nonprofits publish their demographics, that information will remain online forever. There are numerous organizations that track, scrape, and archive websites on a daily basis. *E.g.*, Internet Archive, *WayBack Machine* (archived Mar. 20, 2025), perma.cc/N65Z-L2VG; Library of Congress, *Search Page* (archived Mar. 20, 2025), perma.cc/5JC5-968C. The “WayBack Machine,” for instance, has captured and archived “over 916 billion web pages on the Internet.” *WayBack Machine, supra*. It has

captured Member A's and B's websites thousands of times. Even if their websites were changed or deleted and all archives were somehow lost, the information would *still* be available on other websites (and archives of those websites) that aggregate and track this information about nonprofits.

12. Members A and B will have to publish their demographic data in December 2025. The law makes nonprofits publish their demographic data “[w]ithin 30 days after filing [their] annual AG990-IL Charitable Organization Annual Report.” 805 ILCS §105/114.5(a). Members A and B will file that report in November 2025, so they will have to publish their demographic data by December 2025.

13. The Alliance's ability to protect the true identities of its members, including Members A and B, is vitally important to it and its current and prospective members. I know the importance of anonymity not only from what members tell the Alliance, but also from my personal experiences with another organization I led, Students for Fair Admissions.

14. I have witnessed firsthand the retaliation that individuals can receive for bringing litigation challenging racial preferences. For example, I supported Abigail Fisher in her challenge to affirmative action in *Fisher v. Univ. of Texas at Austin*, 570 U.S. 297 (2013), and *Fisher v. Univ. of Texas at Austin*, 579 U.S. 365 (2016). Ms. Fisher “endured consistent harassment since 2008” as “a direct result of [her] involvement in that case.” *SFFA v. Harvard Coll.*, No. 1:14-cv-14176 (D. Mass. Apr. 29, 2016), ECF 150-4 ¶3. She experienced “threats” and “insults” from across the country, and she suffered professionally. *See* ¶5, ¶¶9-10. Ms. Fisher explained that these experiences “often led [her] to second guess [her] involvement in the case and as an advocate against unlawful affirmative action policies.” ¶11.

15. As a Jewish man, I regularly receive vile, anti-Semitic messages—including death threats—for my role leading organizations that oppose racial classifications. To take just a few examples:

(a) Recently, I received a voicemail that said, “Hey Edward tiny-dick Blum. We know you don’t believe in equal rights. We know you’re a racist piece of shit. Go fuck yourself. I’m going to ruin your fucking career you stupid piece of shit because you are a scumbag traitor who should be fucking hanged for treason. But let’s not digress, right? You’re a fucking joke. Get real. You do not believe in equal rights. And I will destroy your non-profit status because you’re not a non-profit. Oh and also: Go fuck yourself.”

(b) I also recently received an email from someone named Eloy Sedillos (glare-assists.4a@icloud.com) who wrote, “Go fuck yourselves white pieces of white trailertrash. You white people are over rated. But don’t worry we are taking back what you stole by sheer numbers alone because your sperm counts are so low and aren’t producing white ugly babies it is so easy. So fuck you all and may your building get bombed in the coming civil war. You all will need to be extinguished.”

(c) After the Washington Post published an article titled, “McDonald’s sued over scholarships for Hispanic and Latino students,” a commenter said, “I hope that Edward Blum gets hit by a truck.”

(d) I also received an email from someone named Torren Justin Wilson (torrenwilson@gmail.com), who wrote, “SUCK MY DICK AND BURN IN HELL BITCH ASS KIKE!!!!!!!!”

(e) Another poster, a professor at Drake University and the founder of the Black Men’s Literacy Project, added that “Ed Blum” backing an Alliance suit proves that “Jews have no ethics but benefits from donors.” @babyboi2u, X (Aug. 28, 2023 7:24am), twitter.com/babyboi2u/status/1696121655737688348.

(f) I often receive threatening voicemails. One recent message said, in an ominous voice, “I heard you didn’t want to grow old. Guess what? That might just happen. You need to understand, [inaudible] is after you. And he’s going to get

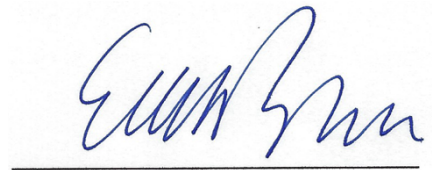
you. Just think about that. When you look behind ya, you'll never know what's coming at ya.”

(g) A popular Instagram user, with nearly 200,000 followers, posted about another Alliance suit—gratuitously adding rumored information about the city where I live and even the color of my house. @itskimberlyrenee, Instagram (Aug. 15, 2023) (deleted).

(h) An anonymous poster on X attached my picture and wished for my death: “Ed Blum: I Hope You Are No Longer With Us Sooner Rather Than Later #EdwardBlum #SufferYouCoward #PureEvil.” @BrentRe20846159, X (Aug. 5, 2023 5:49pm) (deleted).

(i) Someone named Kate Smith submitted a comment to the Alliance’s website on August 22, 2023, saying she’s “praying God removes you from this world; you don’t belong here.”

Executed on April 1, 2025

A handwritten signature in blue ink, appearing to read "Edward Blum", is positioned above a horizontal line.

Edward Blum
President of American Alliance for
Equal Rights